

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Criminal No. 2:16-CR-20697

v.

Honorable George Caram Steeh

Eugene Reese,

Defendant.

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**DISCOVERY NOTICE**

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1. The attorney for the government knows that the defendant made relevant written or recorded statements, (including grand jury testimony), and/or relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record, as follows:

Date	Agent/Agency	Type (written, recorded, grand jury, oral)
5/19/2016	Michigan State Police	Oral
5/20/2016	Western Wayne Task Force	Oral
9/12/2016	FBI	Recorded oral

2. The attorney for the government knows that the defendant has a prior criminal record:

☐ NO

☒ YES

3. The following books, papers, documents, photographs and tangible objects are within the possession, custody or control of the government and are

intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendant: List.

- Law enforcement agency arrest and incident reports
- Photographs, and audio/video recordings of the May 19, 2016, incident
- Physical evidence seized during the May 19, 2016, incident including heroin quantities

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense: List.

- Forensic chemistry report

5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: List.

- Forensic chemistry

6. The government may introduce evidence obtained from execution of the following search warrants:

☒ Not Applicable

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

☒ Not Applicable

8. The government intends to offer evidence under Rule 404(b), Fed. R. Evid.

☐ Yes      ☒ No      ☐ Unsure

9. The attorney for the government is aware of the obligations imposed by *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence

that is material to either guilt or to punishment in time for effective use at trial.

- 10.If the government discovers additional information of the type described in Paragraphs 1 through 8; it will advise defense counsel in writing. Upon specific request of the defendant the government will make available for inspection or copying the items described in Paragraphs 1, 3, and 4; will furnish the record referred to in Paragraph 2; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph 5 and will provide notice of the general nature of the evidence referred to in Paragraph 8. The government's compliance with any specific request will trigger the defendant's duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If the defendant makes a general request for discovery the government will construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1) (A)-(G). The government's compliance with the defendant's general request will trigger the defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

Respectfully submitted,

Barbara L. McQuade  
United States Attorney

s/Louis Crisostomo  
Louis Crisostomo  
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Dated: November 4, 2016

### CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2016, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

David R. Cripps, Esq.

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